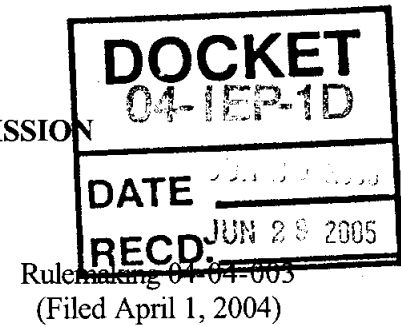


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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Promote Policy and
Program Coordination and Integration in Electric Utility
Resource Planning.



**AND
BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

Integrated Energy Policy Report Process

CEC Docket No. 04-IEP-01

**LOCAL POWER COMMENTS
FOR WOMEN'S ENERGY MATTERS
ON DRAFT STAFF SUMMARY OF IOU RESOURCE PLANS**

PART I

Comments on Community Choice Issues by LOCAL POWER for WEM

June 28, 2005

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LOCAL POWER - WOMEN'S ENERGY MATTERS COMMENT ON DRAFT STAFF SUMMARY OF IOU RESOURCE PLANS

PART I

Comments on Community Choice Issues by LOCAL POWER for WEM

Load departing for Community Choice and other Municipal Strategies

Local Power is a consultant to Women's Energy Matters, an intervenor in this proceeding. Local Power submits comments on the IOU reports, in particular their inadequate reflection of customer load that is seeking to depart IOU service either now or within a reasonable expectation before 2010 based on current public information, such that a procurement that fails to reflect these load departure activities shall be deemed avoidable, and any utility procurement agreements or Utility Retained Generation resulting from them shall be deemed unreasonably entered into.

Local Power does not object to the basic method of deriving figures, but disputes the data included in the figures. IOU report portfolios were constructed in a "bottoms-up" manner consistent with the EAP loading order. Beginning with the forecast of capacity and energy requirements for expected bundled customers (i.e., net of existing Direct Access (DA) and projected Community Choice Aggregation (CCA) and non-core load), losses for transmission and distribution and Unaccounted For Energy (UFE) are added to derive expected capacity and energy requirements. However, the estimates for CCA are far too low. Energy Efficiency (EE) programs and existing interruptible programs reduce these requirements. Existing resources including Utility-Retained Generation, Qualifying Facility (QF) contracts, California Department of Water Resources (DWR)-assigned resources, and other existing contracts were subtracted from the load. Planned resources were then added to the portfolio, further reducing the Net Open Position (NOP). The remaining NOP is filled using the preferred resources identified in the EAP. PG&E first included the target level of EE programs, but again a dramatic underestimation of CCA leads to an equally dramatic underestimation of CCA-based EE and a higher level of removed load resulting from the same Energy Efficiency Public Goods Charge (EE PGC) funds. Distributed Generation is then added based on PG&E and California Energy Commission (Energy Commission) forecasts, but a much higher level of Distributed Generation by CCAs was also underestimated.. Next, state mandated programs are added to the portfolio, including Demand Response (DR) and renewable resources – but the impacts of a significant migration of customer load to a 40% and higher Renewables Portfolio Standard levels by 2017 is missing.

Decision 03-06-032 requires that price-induced DR provide 5 percent of capacity requirements at time of system peak by 2007 and going forward through the planning

horizon. A variety of renewable resources are then added to the portfolio to meet the RPS annual procurement target (APT) of an additional 1 percent of energy requirements met by these resources each year, with total renewables of at least 20 percent of total energy requirements in 2010. Clearly, a large migration of CCA load to a 40% and higher RPS will greatly impact the successful implementation of this goal. Finally, PG&E added conventional thermal resources to balance out the remainder of its capacity and energy requirements is a grave concern to CCA's if such investments are ratebased and become higher Customer Responsibility Surcharges for CCAs seeking to develop renewable energy. Significantly, these thermal resources could potentially increase PG&E customers' over-reliance on natural-gas fired generation, which is already at 43% of PG&E's electric fuel portfolio. The CEC, CPUC and CPA have all acknowledged that overexposure to natural gas was the principal cause of California's Energy Crisis, and Attorney General Bill Lockyer's 2004 White Paper on the Energy Crisis rightly pointed out that the state lacks adequate jurisdiction to prevent a recurrence of the El Paso Phenomenon, which involved not just Enron but also Sempra, Edison and PG&E. Conventional thermal resources include contracts with existing resources and new and efficient dispatchable, shaping and peaking resources, which may be either contracted for or utility-owned.

PG&E's preferred resource plan assumes all new resources will be deliverable to load. PG&E's resource planning process incorporates transmission in an iterative process. All resource plans included here assume all existing and new transmission contained in its most recent CAISO-approved Electric Transmission Grid Expansion Plan, which includes all network reinforcements necessary to meet expected load and are expected to minimize CAISO Reliability Must Run (RMR) requirements in PG&E's service territory. The next PG&E Electric Transmission Grid Expansion Plan will incorporate the procurement anticipated in this resource plan. This is consistent with I.00-11-001 in that the transmission plan is developed based on resources that have been identified. Source: Energy Commission Integrated Energy Policy Report, PG&E Electric Resource Supply & Transmission Plan, April 26, 2005, pages 4-5. Like over investment in generation, over investment in transmission is counterproductive to the goal of placing Energy Efficiency and peaking renewable capacity such as solar at the top of the Loading Order, and would instead subsidize Liquefied Natural Gas (LNG) through ratebasing of new gas fired generation and related transmission by the utilities.

We believe the summary — and Investor Owned Utility (IOU) reports themselves — wrongly minimize the amount of departing load due to Community Choice. Local Power is aware of nearly 20% of California IOU load that is in various phases of formation of Community Choice Aggregation (CCA), best known among them San Francisco. The first group of these will be ready to make binding commitments to depart IOU service by 2006, departing as late as 2007. Like the first, a second group of CCAs ready to make binding commitments by 2007 for departure in 2008 have virtually all approved a 40 % or higher Renewables Portfolio Standard by 2017, and have spent considerable funds preparing to implement CCA. These first two groups of 40% and higher RPS represent approximately 12.5% of statewide IOU customer load. A third group will be ready to make binding commitments by 2008 for departure by 2010, bringing the total CCA figure

up to 17.5% of PG&E, Edison and SDG&E load seeking to depart from IOU load by 2010.

Also, a number of other municipal entities expect to depart from IOU service by 2010 using not Community Choice Aggregation but municipalization. Best known and farthest along the municipalization process politically is Yolo County (preparing to vote in 2006 on annexation from PG&E to SMUD).

Among Community Choice Aggregators, the impacts on each utility's load are comparable among each electrical corporation. For PG&E, San Francisco (Supervisors preparing to vote this summer on implementation plan), which has undertaken an exhaustive process of CCA beginning in 1999 with a resolution asking the legislature for a CCA law, and adopted a CCA Ordinance in May 2004, is the clear leader, followed by Oakland and Berkeley, which have appropriated General Funds for preparation of CCA Implementation Plans pursuant to AB117), and Marin County, Pleasanton, Vallejo, and several other municipalities in the immediate region. In Edison's service territory, both Los Angeles County and a cluster of smaller municipalities, as well as a Joint Powers Agency called the Southern California Cities Joint Powers Consortium, are all within the first and second group. In SDG&E's service territory, Chula Vista adopted a CCA Ordinance in 2004, which SDG&E has firmly ignored and refused to acknowledge in its long term electric procurement plan in the California Public Utilities Commission's electric procurement proceeding. Moreover, the 17.5% of IOU load identified here is only the tip of the iceberg for a veritable movement of California municipalities seeking energy independence and a 40% RPS by 2017 in response to California's ongoing Energy Crisis. Indeed, a variety of other cities and counties are also moving forward, in response to San Francisco and the California Energy Commission's 2004-5 CCA Feasibility Studies for CCA that proposed using CCA with municipal bond financing to achieve 40% or higher renewable portfolio standard by 2017 without requiring a rate increase. Not only are CCAs forming, they are seeking to lead California's effort to accelerate the RPS to 2010 or otherwise raise the 2017 target, as Governor Schwarzenegger has proposed.

The IOU report summary appears to say that only one utility (SCE) has predicted any departing load for CCA.

SCE did not submit a "low load" resource plan. SCE assumes the current level of direct access persists in all resource cases. SCE's total generation level energy requirement is the same for its Reference Case, reflecting total additional departing load (CCA and other) equal to only 5 percent of bundled load by 2013. These assumptions yield a 0.7 percent average annual growth rate for the period 2006-2016. In SCE's Alternate Case, there is even less departing load than what was specified by the Commission for the Reference Case. SCE's Alternate Case has no additional departing load, which yields a higher annual demand growth rate of 1.6 percent.

PG&E predicts no CCA, only some additional direct access:

PG&E's Reference Case assumes no departing load above current direct access levels, as specified in the Forms and Instructions. PG&E used the "low load" straw man assumptions, where 75 percent of current customers with demand of 500 kW and above opt for non-core service, to develop an "IEPR Core/Non-Core" Resource Case: PG&E believes these two cases represent a bandwidth of demand the utility will serve in the future. PG&E developed an alternative scenario (PG&E Preferred) that assumes 50% of current large (500kW and above demand) customers opt for non-utility procurement service in the future. This assumption is consistent with PG&E's 2004 Integrated Resource Plan. (Draft summary p. 105)

This is however inconsistent with PG&E's 2004 procurement plan filings, which indicated 5% of load departing to CCA in the next few years. Local Power believes even this latter figure to be too low, so that greater emphasis on shorter contracts should be required. However, PG&E appears to hedge on its former figure. A couple paragraphs later it appears to refer to CCA departing load:

Given the assumptions made on Demand Response, and CCA and non-core load migration there is a risk that procurement anticipated in the preferred portfolio may not be sufficient to meet actual requirements. Should there be less customer departure, higher load growth, or less Demand Response in the early years of the plan (up to 2010), PG&E would seek to contract with existing generation under short-term contracts to balance its requirements. (ibid, emphasis added).

Staff pass along assurance from PG&E that it is procuring a mix of short-med-long resources and will be able to terminate shorter contracts to accommodate migration, to reduce stranded costs.

It appears that PG&E is only considering the potential for 50-75% of its large (500kW and up) customers to leave. We are left with no information whether PG&E's methods of minimizing stranded costs will cover the contingency of whole cities and counties leaving the system, which appears likely. Among these, AB117 requires that CCAs provide for universal service, and over service to all residential customers. Thus, the IOU reports' segmentation of customer classes should be changed to reflect the regional load departure of CCA's and provide analysis of regional load departures on PG&E based on known CCA activity (such as the Bay Area Cluster, the Los Angeles Cluster, the San Diego Cluster)

SDG&E, which has not acknowledged Chula Vista's CCA ordinance to this day, says it is long on all types of power until more DWR contracts expire after 2010. Among all three IOU's, SDG&E appears the most problematic in terms of limiting its procurement to unavoidable costs, as required by the CPUC in R.03-10-003.

Dated: June 28, 2005

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**BEFORE THE PUBLIC UTILITIES COMMISSION
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Order Instituting Rulemaking to Promote Policy and
Program Coordination and Integration in Electric Utility
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Rulemaking 04-04-003
(Filed April 1, 2004)

**AND
BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

Integrated Energy Policy Report Process

CEC Docket No. 04-IEP-01

**WOMEN'S ENERGY MATTERS COMMENT ON
DRAFT STAFF SUMMARY OF IOU RESOURCE PLANS**

PART II

Comments on Energy Efficiency Resources

June 29, 2005

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WOMEN'S ENERGY MATTERS COMMENT ON DRAFT STAFF SUMMARY OF IOU RESOURCE PLANS

PART II Comments on Energy Efficiency Resources

Introduction

Women's Energy Matters (WEM) is an intervenor in the Integrated Energy Policy Report process at the California Energy Commission as well as Energy Efficiency proceedings at the California Public Utilities Commission. This is Part II - Comments on Energy Efficiency Resources. Part I, Comments on Community Choice Issues by Local Power on behalf of WEM, first submitted to CEC on 6/28/05, is attached and incorporated herein by reference.

IOUs fail to use energy efficiency to address peak load or transmission constraints

Energy efficiency is the state's preferred resource, according to the Energy Action Plan, however its capabilities are sadly underutilized. Energy efficiency could be targeted to reduce peak load and relieve transmission constraints — lessening the need for new power plants and transmission lines. Unfortunately, neither is addressed in utilities' energy efficiency program plans for 2006-8.

The Program Advisory Groups and Program Review Groups (PAGs and PRGs) for energy efficiency complained mightily in their June 2005 comments on each utility's plans that there is so little HVAC either in residential or non-residential programs. Instead the programs concentrate overwhelmingly on lighting, just as they have done for many years, ignoring the fact that air conditioning is the biggest contributor to summer peak load in California.

The result of this mismatch in resources is a much greater perceived need for new power plants, transmission lines, natural gas fuel and related facilities than would be the case if energy efficiency and renewable distributed generation were properly utilized.¹

Utility-run energy efficiency programs more costly than independent alternatives

WEM, TURN, ORA and others commented throughout the four-year energy efficiency rulemaking that the utilities have insoluble conflicts of interest with energy efficiency. For this and other reasons, the CPUC mounted an experiment (2002-2005) awarding 20% per year of Public Goods Charge funds to independent non-utility energy efficiency programs. The independents provided more energy efficiency per dollar in nearly all residential programs, and performed equally with utilities in nonresidential programs, even though they were brand-new programs and did not have the utilities' advantage of economies of scale, access to customer data, and the ability to keep their marketing expenses "off-the-books" in separately funded programs.² Ignoring this record, the CPUC nevertheless awarded control over all 2006-8 programs to utilities in D05-01-055, January 2005.

Not only does this mean that ratepayer energy efficiency funds are being misused by mediocre administrators who provide less energy savings per dollar, it also means that California is not receiving the potentially even greater savings that would result from reducing the construction of new power plants, transmission lines, as well as reducing the ever-rising and volatile expense of more natural gas fuel, and the potentially huge expense of Liquefied Natural Gas facilities.

Utility energy savings claims exposed as vastly inflated

¹ Despite the fact that staff notes the utilities' undercounting of DG (for example, p. 66-7), and the need to ascertain which DG technologies are included in IOU plans, the word "solar" appears nowhere in the report. The word "wind" only appears in the utility tables, not once in the body of the report. The word "cogeneration" only appears once, in a reference to the title of a report. There is no discussion of how the utilities should treat these resources. This is most unfortunate, since resources such as solar and wind address peak load. Since peak load is the driver for capacity, this has the effect of increasing the supposed need for power plants.

² *Myth of IOU Cost-Effectiveness I*, filed in R0101028 by SESCO, August 1, 2003, This is the only study comparing utility and non-utility program reports.

In the months following the January 2005 energy efficiency decision, the CPUC and utilities have gradually acknowledged that utilities' energy savings claims have been massively overstated. As much as 25% of the claimed savings of the past several years are now seen as false.

Most importantly for the IEPR purposes, the utilities should be required to state whether they used updated values when they filled out the CEC's EE forms, and if not, they should provide the latest revised figures or note each time they use earlier assumptions.

For example, on p. 27 PG&E's 1996-2003 impacts, and 2004-5 savings are known to be false, as is the following statement:

Form 3.1a indicates that PG&E will be slightly short on both GWh and MW in the committed period of 2005-2005. [Draft summary p. 27, emphasis added]

Although the draft summary contains references to this issue, it hardly reflects the magnitude of the problem, and does not provide sufficient explanation. While the following statements provide a good start, they need to be fleshed out, otherwise resource planners will not be alerted to serious problems:

Corrections to overstated savings values for some widely used measures (CFLs and programmable thermostats, for example) may make achieving the goals more difficult...

New evaluations protocols for measuring actual load impacts from efficiency programs will need to be adopted and adequately funded to assure the savings projections are realistic. (Draft summary p. 15)

The Draft Summary neglects to mention that there have been no adjustments to the 2004-2005 energy savings claims, which were made before the new figures were widely accepted (although WEM and others had documented them since 2003). Although utilities and the CPUC are now aware that current programs are not delivering the amount of savings that were projected when plans were filed, there has been no requirement for utilities to adjust their savings claims or acknowledge that they are not meeting their goals.

Background. The one bright spot in the January decision was that the CPUC for the first time removed control of energy efficiency measurement from utilities. In the past, the utilities not only hired and directed energy efficiency measurement consultants who measured their program savings, they also controlled all measurement studies, including energy efficiency “potential” and engineering studies that were supposed to be used to update the standardized assumptions of savings achieved by commonly used measures, contained in the Database for Energy Efficiency Resources (DEER). In recent years utilities were also in charge of updating the DEER (the Energy Commission had once been in charge of maintaining it, but was unable to fulfill this responsibility). The DEER has not yet been fully updated since the mid-1990s.

Compact Fluorescent Lights overstated by 400%. CFLs — the curlicue bulbs — constitute the single largest portion of utilities’ claimed savings for residential and commercial programs. Unfortunately, *Utilities have been overstating CFL energy savings for businesses by 400%.* The first official acknowledgment of this fact was in the final evaluation of the Statewide Express Efficiency (small business) program, released April 19 (study dated March 21, 2005):

www.calmac.org/publications/!Final_2003_Express_Eval_Report_and_Appendices.pdf

The CFL story is laid out clearly and is self-explanatory (p. 2-22 to 2-31 [pdf p. 47-56]). The summary of "lifecycle" savings (pdf p. 54) shows that CFLs are getting less than a quarter as much savings as the IOUs claimed. *Because CFLs are 61% of the small business Express Efficiency program, the overall savings for this program are reduced more than 40% a year.*

Women’s Energy Matters (WEM) and SESCO first identified the inflated CFL claims in 2003, and Center for Small Business and the Environment filed its first comments on the issue in early 2004. Nevertheless, the utilities have continued to file reports on past programs and applications for new programs using the same inflated numbers, without rebuke. For example, Southern California Edison’s current business programs call for the installation of over 656,800 CFLs using this same exaggerated value for the resultant savings.

When Edison filed an application (Feb. 25, 2005) for a \$57m “emergency” summer program using false CFL claims, WEM filed objections at the Commission and encouraged others to do likewise. The company backed down and agreed to abide by the results of the CFL Express Efficiency study (which had just been released) — but only for one of its new summer programs. Their savings claims for the other 650,000+ CFLs remain the same, despite our request the Commission act to correct those as well.

We are finally promised “real” numbers in the 2006-8 program filings, but at the Prehearing Conference on IOUs portfolios 6/22/05 the Judge expressed concern over the possibility of further gaming of the EE system. The Staff Summary notes that the utilities’ numbers submitted to the Energy Commission are far from reliable or transparent: “Each utility used a slightly different method of reporting efficiency savings. Supply and Demand forms often reported different values.” (Draft Summary p. 13)

DEER update shows actual energy savings reduced as much as 49%. The utilities quietly released an interim (partial) update of the Database for Energy Efficiency Resources (DEER) March 31, 2005³ and predict a more complete version will be available in August. *The interim update reveals that the system for calculating most energy savings has been using inaccurate values for years.*

Buried deep in the documents for its February 23, 2005 Program Advisory Group (PAG) meeting, PG&E's Handout #8 (attached) explains the expected impacts on some current programs from the (as yet incomplete) DEER update. *Achievements for the current program years 2004-5 would be reduced 39-49% for the residential single family and upstream lighting programs and 20-23% for the small business Express Efficiency program. (Note: the example only covers two years. Savings are cumulative, and would show additional reductions over the “lifetime” of each measure.)*

³ The interim update was sent only to the “CALMAC” list (California Measurement Advisory Council), a utility-dominated group for discussing energy efficiency measurement.

Utilities' ability and intention to meet energy savings goals in doubt

The utilities have been complaining they will have trouble meeting the energy savings goals the Commission set in September 2004. Obviously, if they have to use real numbers, it will be a lot harder. A CPUC Ruling May 11 2005 (in R0108028) allows them to meet lower targets in 2006 and 2007 if they meet the overall cumulative goals by 2008. The Staff summary takes note of this on p. 14. *This allows utilities to postpone the day of reckoning, without providing any recourse for ratepayers if utilities fail to deliver.*

As the Staff Summary notes, the CPUC granted this allowance because the utilities are for the first time being required to report “committed” savings in the year that the savings are actually produced, rather than in the year they were funded. “Commitments” refer to savings that will take place in future years, such as design changes for new construction or remodeling. The utilities’ reports on 2003 programs showed more than 80% of PG&E and Edison’s large commercial programs were “committed” not actual savings (while SDG&E and SoCalGas reports simply ignored the distinction).⁴

Oddly, PG&E and Edison are telling the Energy Commission that they will get *more* savings in the early years of the three-year 2006-8 cycle. The Staff summary raises questions about such statements: “PG&E’s expectation that savings will be highest in the first year of a new three-year program cycle seems implausible...” (Draft Summary p. 25). “SCE’s assumption that it will be possible to add 970 new GWh in the first year of a new program cycle seems implausible based on the analysis of historic IOU savings and spending trends used to develop the goals.” (p. 30)

CPUC accepts 85% of goals as good enough. The Energy Commission should note that the CPUC’s September 2004 Goals decision allows utilities a 15% fudge factor without any sanctions. Any forecasts on energy savings from utility programs should be reduced by this much at least.

⁴ *The Myth of IOU Cost-Effectiveness II*, filed in R0108028 by SESCO, May 10, 2004, analyzed committed v. actual savings for program year 2003.

Texas EE programs produce 40% more energy savings per dollar than California.

Women's Energy Matters' coalition proposed a "California Standard Offer" system for energy efficiency, based on a system operating in Texas since 2000 that produces 40% more energy savings per dollar. **Texas' energy savings are 100% guaranteed.**

Achievements in the Texas system are 100% guaranteed, because program providers are paid only for savings that they have actually achieved, unlike California programs, which do not link payments to savings. (Utilities are not allowed to select, design or implement programs in Texas; all programs are independent, although utilities provide nominal administrative oversight.)

California could concentrate on reducing peak load. 96% of Texas residential energy savings in 2003 came from HVAC and shell measures. By comparison, only 3.3% of California's residential savings for 2004-5 programs are from such measures; 94% are from lighting, vs. 1.9% of Texas programs.⁵

Vast underestimated potential for reducing peak load in California. It should be obvious from the above figures that California has barely tapped the potential for energy savings in California, especially from residential customers. Utility-funded "potential" studies — and the programs themselves — have underplayed the potential for energy savings in the residential sector, concentrating instead on commercial/ industrial/ agricultural programs.

Edison plays fast and loose with ratepayer funds this summer. The foregoing facts should be weighed against statements such as: "SCE believes the post-2008 goals are not credible and a resource plan based on them would expose ratepayers to unnecessary risk." (Draft summary p. 13) It is SCE and other utilities' poor planning and refusal to provide full value for ratepayers EE dollars that really expose ratepayers to unnecessary risk. All the utilities are pumping up huge ratepayer surcharges to throw PGC as well as procurement money at the 2006-8 goals, but Edison's spending this summer is uniquely

⁵ WEM and SESCO comments in R0108028 on EE Administrative Structure, May, October, December 2004, January 2005. See www.womensenergymatters.org

wasteful. It gained approval in D0505012 to spend \$57 million just to *expedite* energy savings — not achieving a single extra megawatt-hour of savings. Although it justified this “emergency program” based on potential shortfalls at peak hours, it provided only a small increase of HVAC (peak measures), with the vast majority going to commercial lighting that mostly misses the peak. **No savings were targeted at transmission constraints**, while Edison is busily lobbying for approval of a major new transmission line.

Community Choice Energy Efficiency offers an alternative to failed IOU programs

Cities and counties that are working on becoming Community Choice aggregators were dismayed that the CPUC has so far denied them an opportunity to “apply to administer” their energy efficiency funds as AB117 promised. The utilities currently have control over all EE programs, even in Community Choice territories. The IEPR should take note that this issue has not yet been finally settled — WEM still has outstanding an Application for Rehearing of D0501055, San Francisco has formally requested the CPUC to allow access to their Public Goods Charge funds in order to include the least expensive resource in their Integrated Resource Plan, and other CCAs are preparing to pursue this question also. WEM believes that energy efficiency will be a contentious issue as long as CCA’s are denied funds. This is not fair and is extremely short-sighted as energy efficiency grows ever more important in a time of uncertainty and stress on the electricity/gas system and the planet, while the IOUs fiddle around with ineffective and wasteful programs.

Dated: June 29, 2005

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CERTIFICATION OF SERVICE

CEC Docket No. 04-IEP-01

I, Barbara George, certify that on this day June 29, 2005 I caused copies of the attached
WOMEN'S ENERGY MATTERS COMMENT ON
DRAFT STAFF SUMMARY OF IOU RESOURCE PLANS
PART I Comments on Community Choice Issues by LOCAL POWER for WEM
PART II Comments on Energy Efficiency Resources
to be served on all parties by emailing an electronic copy and mailing one original to the
CEC Docket office.

Dated: June 29, 2005 at San Francisco, California.

DECLARANT